



U.S. Department of Justice

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August 28, 2023

VIA ELECTRONIC MAIL

Honorable Jeremiah J. McCarthy
United States District Court
2 Niagara Square
Buffalo, New York 14202

RE: **United States v. Gogolack**
23-MJ-1115

Dear Judge McCarthy:

I am writing the Court to request an adjournment of the detention hearing for defendant Simon Gogolack until August 30, 2023 at 2 PM. Today, I spoke with Robert Bolm, Esq., the attorney retained to represent Simon Gogolack. Due to medical issues facing attorney Bolm, he represented to me on the phone that he would be unable to appear for the detention hearing scheduled for tomorrow, August 29, 2023. Attorney Bolm informed me that he would be able to appear on Wednesday, August 30, 2023.

The parties conferred by phone with the Court's staff regarding a time for August 30, 2023, and agreed upon 2 PM. The government offered to submit this letter requesting a 1-day adjournment on behalf of attorney Bolm given his current circumstances. Speedy Trial Time should be excluded under as a matter of law pursuant to Title 18, United States Code, Section 3161(h)(1)(D) as the government's motion for detention is still pending.

Respectfully,

TRINI E. ROSS
United States Attorney

BY:

NICHOLAS T. COOPER
Assistant United States Attorney

NTC

cc: Robert Bolm, Esq.